

EXHIBIT 2

EXHIBIT 2

From: [Liddell, Lindsay L](#)
To: [Const2Audit](#)
Cc: [Larkin, Stephanie](#); [Burnett, Andrew Cobi](#); [Alison Kertis](#)
Subject: RE: Meet and confer re video depositions- protective order
Date: Tuesday, March 11, 2025 2:31:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)




Hello Mr. Ribar,

This is to summarize our brief conversation over the phone. You stated that you were recording the call, and I stated that I did not consent to being recorded. You then stated we needed to end the call. You did not wish to meet and confer via telephone unless you could record the conversation. I explained that the rules require a meet and confer via telephone or in person, and requested clarification from you. You stated you would not stay on the call unless you could record it. I also stated that you're welcome to provide your position on the below proposed protective order via email, though that would not comply with the rules.

Again, please feel free to provide your position on Defendants' proposed protective order via email. I would still like to meet and confer with you via telephone, but I do not consent to being recorded.

Sincerely,
Lindsay Liddell



Lindsay L. Liddell
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District Attorney's Office
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One South Sierra Street, Reno, NV 89501
   


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From: Const2Audit <const2audit@gmail.com>
Sent: Tuesday, March 11, 2025 2:08 PM
To: Liddell, Lindsay L <lliddell@da.washoecounty.gov>
Cc: Larkin, Stephanie <slarkin@da.washoecounty.gov>; Burnett, Andrew Cobi <CBurnett@da.washoecounty.gov>; Alison Kertis <akertis@sierracrestlaw.com>

Subject: Re: Meet and confer re video depositions- protective order

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I attempted to call, and got a voicemail.

Available today until 2:45pm

tomorrow anytime after 6 am

Available Thursday all day.

Booked up Friday.

Drew Ribar

775-223-7899

On Tue, Mar 11, 2025 at 12:25 PM Liddell, Lindsay L <lliddell@da.washoecounty.gov> wrote:

Hi Mr. Ribar,

I am writing to request that we meet and confer via telephone this week regarding Defendants' proposed protective order regarding non-litigation use of compelled discovery, including video recordings of depositions. Defendants intend to seek a protective order that prohibits publication of deposition video, and use of the video for any purpose other than use in litigation for this case. While the FRCP permits videotaping depositions by a certified technician, there is no rule that allows a litigant to publish the videos. We have reason to believe that you are requesting to video the deposition so that you may use the video for content on your various social media pages.

Federal Rule of Civil Procedure 26(c) governs protective orders, and allows the Court to "issue an order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense." Defendants in this case have already experienced substantial harassment, embarrassment, annoyance, and oppression from your social media posts and videos. For example, attached are emails Ms. Bowen received following your Youtube videos of Ms. Bowen, including providing her email address with an offer to users of \$100 to "spot the government lies," and the

video referring to her as a “lying, crying, librarian.” Others in your videos have also experienced damage to their reputation. For example, you’ve posted numerous videos claiming Director Scott claiming he assaulted and/or battered you. You have also posted several videos documenting the litigation against Defendants. This presents a clear and specific threat that you will use discovery materials in an abusive manner.

Based on the foregoing, Defendants believe a protective order is appropriate to prohibit publication or sharing of audiovisual deposition recordings and other information obtained through compelled discovery for any purpose outside litigating this case. If you’re in agreement, I will circulate a proposed protective order.

If you disagree with a protective order as described, I would like to meet and confer via telephone at your earliest convenience. I am available to meet and confer the following dates/times:

Today (3/11) between 2pm-4pm

Tomorrow (3/12) any time

Thursday (3/13) between 11 am-5 p.m.

Friday (3/14) between 8 a.m.-9:30 a.m., and from 1p.m. to 5 p.m.

Please respond by Thursday, March 13th at the latest because we have depositions scheduled in the next few weeks. Otherwise, we may need to reschedule the depositions so we can resolve this issue beforehand.

Thank you,
Lindsay Liddell



Lindsay L. Liddell
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